

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

In the Matter of the Petition

of

GRACE OCEAN PRIVATE LIMITED, as
Owner of the M/V DALI,

and

SYNERGY MARINE PTE LTD, as Manager
of the M/V DALI,

for Exoneration from or Limitation of
Liability.

Docket No. JKB 24-cv-941

IN ADMIRALTY

**CONSENT MOTION FOR ENTRY OF A
STIPULATION AND ORDER FOR EXTENSIONS OF TIME**

Petitioners, Grace Ocean Private Limited (“Grace Ocean”) and Synergy Marine Pte Ltd (“Synergy”) (collectively, “Petitioners”), by and through undersigned counsel, respectfully move this Court, with the consent of Claimants, through their court-appointed lead counsel, for entry of a Stipulation and Order extending the time within which (a) Synergy shall file its Opposition to Claimants’ Motion for Summary Judgment (ECF No. 605); and (b) Claimants shall file their Reply thereto. In support, Petitioners state as follows:

1. On August 29, 2025, Claimants filed a Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56 seeking dismissal of Synergy’s petition for limitation alleging a lack of standing.
2. Under Local Rule 105.2(a), Synergy’s opposition to the Motion for Summary Judgment is currently due on or before September 12, 2025, with Claimants’ reply being due

within fourteen (14) days thereafter. Pursuant to Federal Rule of Civil Procedure 6(b)(1), the Court may, “for good cause shown, extend the time an act may or must be done, with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.” *See* Fed. R. Civ. P. 6(b)(1)(A).

3. Petitioners and Claimants have conferred and agreed regarding a summary judgment motion briefing schedule and respectfully request the Court approve and enter the Stipulation and [Proposed] Order submitted herewith setting forth the following deadlines:

Synergy’s Opposition Due by September 30, 2025

Claimants’ Reply Due by October 14, 2025

4. There will be no prejudice or undue delay by the limited extensions requested herein.

WHEREFORE, Petitioners, with the consent of Claimants, through court-appointed lead counsel, respectfully request that this Honorable Court grant this Consent Motion and enter the Stipulation and [Proposed] Order being submitted herewith setting the summary judgment motion briefing schedule agreed upon by the parties.

Dated: September 9, 2025

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CERTIFICATE OF SERVICE

I CERTIFY that on this 9th day of September 2025, a copy of the foregoing Consent Motion for Entry of a Stipulation and Order for Extensions of Time, along with a Stipulation and [Proposed] Order, was electronically filed and served via the Court's CM/ECF filing system, on all counsel of record.

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